

June 22, 2021

BY ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket 5022 - Suspension of Service Terminations and Certain Collections Activities During the COVID-19 Emergency – Terminations Responses to PUC Data Requests – Set 5

Dear Ms. Massaro:

On behalf of National Grid,¹ I have enclosed the Company's responses to the PUC's Fifth Set of Data Requests in the above-referenced matter.²

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Sincerely,



Raquel J. Webster

Enclosure

cc: Docket 5022 Service List
Jon Hagopian, Esq.
John Bell, Division
Linda George, Division

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

² Per Commission counsel's update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing. The Company will provide the Commission Clerk with a hard copy and, if needed, additional hard copies of the enclosures upon request.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

June 22, 2021

Date

**Docket No. 5022 – COVID-19 Emergency Order
Service List as of 4/1/2021**

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The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5022
COVID-19 Emergency

In Re: Suspension of Service Terminations and Certain Collections Activities
Responses to Commission's Fifth Set of Data Requests
Issued on June 16, 2021

PUC 5-1

Request:

On March 19, 2021, the Commission extended the winter moratorium on service terminations for protected status customers of National Grid Electric and National Grid Gas, including all customers on Rate A-60 to 11:59 p.m. on June 25, 2021. The Company had no restrictions on normal collections activities for its remaining residential customers commencing September 30, 2020, other than the limited protections offered during the winter period by the Commission's Rules and Regulations Governing the Termination of Residential Gas, Electric, and Water Utility Service. The moratorium on service terminations was lifted for all other regulated utilities effective July 17, 2020. The winter moratorium period (November 1, 2020-April 15, 2021) was not extended for any other customers.

- (a) Please provide an update on the Company's collections activities as relate to standard customers, including those on rate A-16 between September 30, 2020 and April 15, 2021.
- (b) Please provide an update on the Company's collections activities as relate to standard customers since April 16, 2021. Please provide any information on the collections phase the Company is in (referencing the original collections plan filed in this docket) as well as the effectiveness of customer outreach and collections activities to date.
- (c) Please provide an update on the Company's collections activities as relate to protected customers since April 16, 2021. Please provide any information on the collections phase the Company is in (referencing the original collections plan filed in this docket) as well as the effectiveness of customer outreach and collections activities to date.
- (d) Please provide an explanation of the Company's upcoming collections activities commencing June 28, 2021 for all residential customers. Please include an explanation of what phase the Company is entering into, explanation of the customer outreach plans, payment plans to be offered, and discussion of any coordination with state agencies, CAP agencies, etc., as well as prioritization.

Response:

- (a) As described in National Grid's May 15, 2020 filing in this docket, National Grid developed the COVID-19 Emergency Bill Payment and Customer Assistance Program plan, which is a phased approach to engage all customers proactively and direct those in need towards assistance resource programs to help them manage usage and prevent arrears from accumulating. The Company's priorities were to:
 - Maximize uptake of federal / other financial assistance through frequent and targeted outreach to customers.
 - Remind customers about their outstanding arrears and programs they could sign up for, including COVID-19 payment plans, to remain current on their utility bills.

PUC 5-1, page 2

In the June through October 2020 period, the Company implemented Phase 1 of the Bill Payment & Customer Assistance Program plan, which included continued awareness and education outreach, and incorporated additional outreach with payment assistance and bill reminders. In late October 2020, the Company transitioned to Phase 2A which included targeted outreach campaigns to prepare customers for the gradual resumption of collections activities.

In Phase 2A, the Company sent disconnect awareness notices to customers informing them of the Company's gradual resumption of collection activities. The Company also launched targeted outbound calling campaigns to encourage customers to enroll in deferred payment agreements ("DPAs") and seek financial assistance. Starting in April 2020, the Company expanded the categories of these calling campaigns and added different campaigns, including but not limited to: Defaulted DPA campaigns, Final Bill campaigns, Non-Sufficient Funds ("NSF") campaigns, etc. Additionally, the Company sent 'transition' postcards and emails to all residential customers more than 30 days past due with a balance of greater than \$50 forewarning them that the Company will be transitioning to restart disconnections in the near-term, and that they are at risk of disconnection.

During this time period (December 2020 to March 2021), outreach to residential (including income eligible) customers included:

December 2020

- Ongoing paid social and paid search campaigns
- Disconnect Awareness Notices
- Targeted Arrears Calling Campaigns

January 2021

- Two January webinars in English and Spanish, 512 total customers attended
- Ongoing paid social and paid search campaigns
- Winter High Bills Email and Bill Insert
- Disconnect Awareness Notices
- Targeted Arrears Calling Campaigns
- WeConnect Quarterly All Customer Newsletter
- Financial Assistance Radio & Digital Ads

PUC 5-1, page 3

February 2021

- Ongoing paid social and paid search campaigns
- New Year Message Email and Bill Insert to all customers
- Disconnect Awareness Notices
- Targeted Arrears Calling Campaigns
- Financial Assistance Radio and Digital Ads
- Bi-lingual Laundromat Posters

March 2021

- Two March webinars in English and Spanish, 129 total customers attended
- Ongoing paid social and paid search campaigns
- Disconnect Awareness Notices
- Targeted Arrears Calling Campaigns
- Bill Help ads on WPRI

Further, during this time period (December 2020 to March 2021), outreach to income eligible customers included:

December 2020

- Discount rate direct mail with printed discount rate applications to 24,000 potential LMI customers
- HEAP Email delivered to 14,593 potential LMI customers
- Ongoing paid social and paid search campaigns

January 2021

- Two January webinars in English and Spanish, 512 total customers attended
- Ongoing paid social and paid search campaigns

February 2021

- Discount rate email delivered to 18,637 potential LMI customers
- HEAP Email delivered to 23,547 potential LMI customers
- HEAP Automated Outbound Calls to eligible customers
- Ongoing paid social and paid search campaigns

PUC 5-1, page 4

March 2021

- AMP letter to 1,537 eligible customers and 7,446 discount rate/potentially AMP eligible customers
- HEAP letters delivered to 15,356 past HEAP participants
- Two March webinars in English and Spanish, 129 total customers attended
- Ongoing paid social and paid search campaigns

- (b) Since April 16, 2021, the Company progressed into Phase 2B of its Customer Assistance Program plan, which includes targeted disconnect notices and planning for restarting disconnections. As noted in the Company's comments in this docket on March 18, 2021, the Company began sending formal disconnect notices to customers in late April. In the disconnect notices, the Company informed customers that their services could be disconnected on or after June 28, 2021.

The Company also significantly scaled outbound calling campaigns to customers and conducted several multi-channel supplemental outreach touchpoints for customers. As of June 11, 2021, the Company sent almost 110,000 residential disconnect notices to customers, which resulted in an incremental \$8.6 million in payments, including payments from protected customers. The Company sent over 100,000 postcards to customers, which resulted in an estimated 7% increase in payments from customers, including protected customers.

The Company has maintained its rigor in driving customers to seek financial assistance and has reiterated this message to customers across various channels (contact center, mail, outbound calling, disconnect noticing, etc.).

- During this time period (April to June 2021), outreach to residential (including income eligible) customers included:

April 2021

- Ongoing paid social and paid search campaigns
- Disconnect Awareness Notices
- Targeted Arrears Calling Campaigns
- Phase 2 Disconnect Resumption Awareness Postcards & Emails
- WeConnect Quarterly All Customer Newsletter
- Earth Day / COP26 Email to all Residential customers

PUC 5-1, page 5

May 2021

- HEAP Email delivered to 3,698 past HEAP participants
- Two May webinars in English and Spanish, 151 total customers attended
- Payment Plan emails to 3,056 customers
- Ongoing paid social and paid search campaigns
- Forgiveness Program/AMP emails to 3,000 and letters to 2,000 eligible customers
- Targeted Arrears Calling Campaigns
- System Disconnect Noticing

June 2021

- Forgiveness Program/AMP emails to 3,070 and letter to 2,097 eligible customers
- RentReliefRI (Emergency Renters Assistance) Postcards to 11,506 and emails to 7,823 potentially eligible customers (with additional emails and letters being sent in July for a total of approximately 16,000 emails and 23,000 postcards)
- All Customer June Email
- Targeted Arrears
- System Disconnect Noticing

- (c) Since April 16, 2021, the Company progressed into Phase 2B of its collection plan, which includes sending targeted disconnect notices and planning for restarting disconnections. In the disconnect notices, the Company informed customers that their services could be disconnected on or after June 28, 2021. Effectiveness of these efforts is reported as part of the response to part b above.

Outreach efforts to this subset of customers includes the efforts detailed above as well as the following:

Further, during this time period (April to June 2021), outreach to income eligible customers included:

April 2021

- HEAP Email delivered to 25,876 potential LMI customers and past HEAP recipients
- Ongoing paid social and paid search campaigns

The Narragansett Electric Company
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RIPUC Docket No. 5022
COVID-19 Emergency

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PUC 5-1, page 6

May 2021

- HEAP Email delivered to 3,698 past HEAP participants
- Two May webinars in English and Spanish, 151 total customers attended
- Payment Plan Emails to 3,056 customers
- Ongoing paid social and paid search campaigns
- Forgiveness Program/AMP emails to 3,000 and letters to 2,000 eligible customers

June 2021

- Forgiveness Program/AMP Emails to 3,070 and letters to 2,097 eligible customers
- RentReliefRI (Emergency Renters Assistance) Postcards to 11,506 and emails to 7,823 potentially eligible customers (with additional emails and letters being sent in July for a total of approximately 16,000 emails and 23,000 postcards)

The Company has also restarted its protections recertifications for RI Elderly, Handicapped, and Unemployed customers. All accounts due for recertification in January through June with arrears over \$400 were mailed a recertification form. The Company plans to continue targeted outreach for customers most in need, encouraging the participation in financial assistance programs, the AMP and other payment agreements.

- (d) Phase 2B of the Company's collection plan includes restarting field terminations for customers (excluding low-income and protected customers) on June 28, 2021. The Company does not plan to resume disconnections for low-income and protected customers until August. This timing will enable low-income and protected customers to seek financial assistance. When residential disconnections restart for protected customers, the Company will begin terminating accounts with unexpired pre-COVID petition approvals. Once the Company has recertification for these accounts, the Company will start petitioning new accounts.

The Company anticipates progressing into Phase 2C in July 2021, at which point field terminations will scale in terms of volume. The Company plans to continue targeted outreach for customers most in need, encouraging the participation in financial assistance programs, including the AMP and other payment agreements. Additionally, the Company will continue offering the COVID-19 down payment agreement to customers.

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PUC 5-1, page 7

In collaboration with the Department of Human Services (“DHS”), the Company plans to enable a new automatic-enrollment process to increase the number of customers on the Company’s low-income rate classes. Approximately twelve thousand customers will experience rate changes as of approximately July 15, 2021. The Company continues to work with DHS and CAP agencies to distribute LIHEAP funds. (Please see the Company’s response to Data Request PUC 5-3 for details). The Company also continues to collaborate with other state agencies to support the distribution of other federal assistance funds. (Please see the Company’s response to Data Request PUC 5-2 for details).

Customer Advocates are providing direct assist to customers who need individual payment assistance solutions through referrals from the call center and community resource centers such as the CAP agencies, St. Vincent de Paul, Jonny Cakes, George Wiley Center, RIHousing, and United Way/211. The Customer Advocates have also hosted nine live customer payment assistance webinars in English and Spanish. In total, the Customer Advocates assisted 7,244 customers in 2020, and an additional 3,966 customers in 2021.

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PUC 5-2

Request:

Please explain how the Company has coordinated (and will continue to coordinate) with Rhode Island Housing on the COVID related rent and utility assistance funding.

Response:

The Company has been coordinating with RIHousing to facilitate the dissemination of federal funding for rent and utility assistance via the RentRelief RI Program for qualified customers in the following ways:

- To support the verification requirements of the program and enable RIHousing to approve customer utility arrearage claims, the Company is providing secure access to a web portal, which will enable RIHousing to verify customer arrearage balances accrued since the beginning of the COVID-19 Pandemic. The Company is also providing RIHousing with a direct contact if additional customer information is required to complete an application.
- For approved applicants, the Company will process bill credits directly to the customer's utility account.
- The Company is providing increased awareness of the RentRelief RI Program to customers. In addition to individual customer referrals, the Company included information about the program in an April 23, 2021 appearance in the "Rhode Island Road Show." The Company also promoted the RentRelief RI Program during two customer webinars on May 19, 2021; one of those webinars was in English and the other in Spanish. Over a four-week period beginning the week of June 14, 2021, the Company anticipates sending approximately 16,000 emails and 23,000 postcards about the RentRelief RI program to customers that may be eligible for the benefit.
- Please see the Company's response in PUC 5-4 for how the Company plans to work with customers who have a termination notice and have also applied to RIHousing for assistance.

The Company will continue to coordinate with the State of Rhode Island regarding additional actions the Company can take to further accelerate the dissemination of federal funds to eligible Rhode Island customers.

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PUC 5-3

Request:

Please explain how the Company has coordinated with DHS and/or CAP agencies related to any additional LIHEAP funding.

Response:

The Company has worked closely with the Rhode Island Department of Human Services (“DHS”) and Rhode Island Community Action Program (“CAP”) agencies since the beginning of the COVID-19 Pandemic to increase customer education about the Low Income Home Energy Assistance Program (“LIHEAP”) to all residential customers with arrears. The Company has promoted LIHEAP through multiple outreach channels including: direct customer referrals, customer webinars, direct mail, direct e-mail, outbound calls, social media, on-bill messages, bill inserts, print ads in local newspapers, in-store displays and posters, and radio and television appearances.

The Company has helped facilitate approximately \$8 million in LIHEAP gas and electric heating assistance bill credits since the beginning of the Pandemic. By the end of the summer of 2021, the Company anticipates that it will also have processed approximately \$10 million in supplemental LIHEAP bill credits for electric cooling assistance since March 2020.

National Grid customer advocates are also a resource for DHS and CAP agencies, training CAP agencies on how to use National Grid systems to not only process LIHEAP credits, but also to help customers who need additional individual payment assistance solutions.

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PUC 5-4

Request:

Assume a customer contacts the Company about a termination notice and indicates they can provide proof that they filed an application with Rhode Island Housing for utility assistance. How does the Company respond? What options does the Company give to the customer?

Response:

Upon the customer's presentation of proof of application to RIHousing, the Company will hold the account from collection activity for 30 days to allow the utility assistance grant time to post to the customer's account.

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PUC 5-5

Request:

Please respond to the following hypothetical: A customer has an arrearage balance of \$2,400. The customer has \$1,200 applied by Rhode Island Housing as COVID related. The customer now needs a payment plan for the remainder. Ignore AMP unless specified in the question.

- (a) Is the \$1,200 considered the customer's down payment on the arrearage? If not, why not?
- (b) What term is the customer offered for payment plans (12, 18, 24, 36 months)? For this response, assume the Commission retains the 18- 24- and 26- month payment plans outlined in the July 13, 2020 Order in this docket.
- (c) What happens if the customer does not enter into a payment plan after the \$1,200 is applied to the account?
- (d) If the customer is eligible for AMP, is the AMP offered on the remaining \$1,200?

Response:

- (a) The \$1,200 will be considered a down payment toward the arrears.
- (b) The customer will be offered a zero-down-payment agreement for 18, 24, or 36 months, following the arrears bracketing established in the Commission's July 13, 2020 Order.
- (c) The account would be subject to collection activity on any arrears that are not covered by a utility payment assistance pledge for that account or paid by the RIHousing grant.
- (d) If the account meets all eligibility criteria, the customer would be offered enrollment into AMP. Enrollment in AMP would be prioritized above enrollment in a non-AMP deferred payment agreement.

PUC 5-6

Request:

What modifications has the Massachusetts DPU made to the AMP (that are currently in effect)?

Response:

In Massachusetts, Massachusetts Electric Company’s, Nantucket Electric Company’s, and Boston Gas Company’s (together, “National Grid MA”) Arrearage Management Program (“AMP”) is defined through an annual filing that National Grid MA submits to the Massachusetts Department of Public Utilities in coordination with the other Massachusetts investor-owned utilities and Massachusetts low-income stakeholders, including advocacy organizations, Community Action Agencies, and the Massachusetts Attorney General’s office. Before the COVID-19 Pandemic, National Grid MA’s AMP was different than the Company’s AMP in several ways. National Grid MA also proposed several modifications to its AMP to better serve qualified customers during this unique time. Please see the following table for the current differences between National Grid MA’s and the Company’s AMPs, with the National Grid MA COVID-19 Pandemic-related AMP modifications bolded:

Rhode Island	Massachusetts
Termination notice required for AMP enrollment, except during the winter moratorium, as established through a 2017 settlement agreement with the Center for Justice.	No termination notice required for AMP enrollment.
Must be LIHEAP eligible and enrolled on the Company’s low-income rate classes.	Must be eligible for a means-tested program, frequently demonstrated by a customer’s enrollment on National Grid MA’s low-income rate classes.
Up to \$1,500 in annual forgiveness.	Up to \$4,000 in annual forgiveness, increased to up to \$12,000 in annual forgiveness through at least February 2022, as a result of the COVID-19 pandemic.
A customer must contact the Company to renew their AMP annually if they have a balance over \$1,500 and want additional arrears forgiven.	A customer’s AMP plan extends to the required number of months needed to forgive all arrears.

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PUC 5-6, page 2

A customer can only participate once every two years.	The AMP was a one-time opportunity for customers, but that rule was suspended through at least February 2022, as a result of the COVID-19 pandemic.
A customer must contact the Company to enroll.	A gas customer must contact Boston Gas Company to enroll. As a result of the COVID-19 Pandemic , Massachusetts Electric Company and Nantucket Electric Company created an automatic enrollment process for all eligible electric customers. This process took approximately nine months to operationalize and was only possible because Massachusetts Electric Company's and Nantucket Electric Company's systems contained all required eligibility information.